

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CAREFUL SHOPPER, LLC,

Plaintiff,

-against-

TP-LINK USA CORPORATION d/b/a TP-  
LINK NORTH AMERICA, INC.,

Defendants.

1:18-cv-03019-RJD-RML

**SUPPLEMENTAL DECLARATION OF HEATHER AUYANG IN SUPPORT OF  
DEFENDANT TP-LINK USA CORPORATION'S MOTION TO DISMISS FOR LACK  
OF PERSONAL JURISDICTION AND SUBJECT MATTER JURISDICTION**

**SUPPLEMENTAL DECLARATION OF HEATHER AUYANG**

I, Heather Auyang, hereby declare as follows:

1. I am an attorney admitted *pro hac vice* to practice before this Court and an attorney at the law firm of LTL Attorneys LLP, counsel for Defendants TP-Link USA Corporation and TP-Link North America Inc. I have personal knowledge of the matters stated in this Supplemental Declaration and, if called as a witness, I could and would competently testify to them.

2. Plaintiff produced documents during jurisdictional discovery, including a list of TP-Link products purportedly purchased by TP-Link using the Amazon.com marketplace. Attached hereto as **Exhibit A** is a true and correct copy of the list produced by Plaintiff labeled Bates Nos. CS00032-00040. TP-Link “Order #111059255282257031” from Amazon on Nov. 6, 2017 is listed at CS00038. Order #111059255282257031 is for ASIN number B01HXM8XHO.

3. Attached as **Exhibit B** is a true and correct copy of the printout from the Amazon.com website located at [https://www.amazon.com/TP-Link-Dimmable-Equivalent-Assistant-LB120/dp/B01HXM8XHO/ref=sr\\_1\\_1?keywords=B01HXM8XHO&qid=1551235630&s=gateway&sr=8-1](https://www.amazon.com/TP-Link-Dimmable-Equivalent-Assistant-LB120/dp/B01HXM8XHO/ref=sr_1_1?keywords=B01HXM8XHO&qid=1551235630&s=gateway&sr=8-1) for ASIN number B01HXM8XHO, which is identified as the LB120 sold as the *single-bulb*.

4. Attached as **Exhibit C** is a true and correct copy of the printout from the Amazon.com website located at [https://www.amazon.com/TP-Link-Smart-Dimmable-White-Control/dp/B075KW9GPB/ref=sr\\_1\\_1?keywords=B075KW9GPB&qid=1551235785&s=gateway&sr=8-1](https://www.amazon.com/TP-Link-Smart-Dimmable-White-Control/dp/B075KW9GPB/ref=sr_1_1?keywords=B075KW9GPB&qid=1551235785&s=gateway&sr=8-1) for ASIN number B075KW9GPB, which is identified as the LB120 sold as a “**2 Pack**.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 27, 2019

By:



Heather Auyang